NO. 49063-3-II

IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION II

DAYANARA CASTILLO,

Appellant,

v.

DEPARTMENT OF SOCIAL AND HEALTH SERVICES,
STATE OF WASHINGTON,

Respondent.

REPLY BRIEF OF APPELLANT

NORTHWEST JUSTICE PROJECT
Scott Crain, WSBA #37224
401 Second Ave. S., Ste 407
Seattle, Washington 98104
206-707-0900, scottc@nwjustice.org

Luanne Serafin, WSBA #47834
711 Capitol Way S., Ste 704
Olympia, WA 98501
360-753-3610, luannem@nwjustice.org

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Page

Cases

TABLE OF AUTHORITIES

Page

Statutes

Rules

Regulations

I. INTRODUCTION

The Department contends that it lacks legal authority to act on Ms. Castillo's request for internal review. This contention is a legal error that this Court should address. Because the Department retained authority, its failure to act or consider Ms. Castillo's request for good cause was also legal error. This Court should vacate the Final Order and direct the Department to give Ms. Castillo internal review of her founded finding of neglect.

II. ARGUMENT

A. The Department's response does not address the central issue: it erroneously interpreted its own authority

As the Department concedes in its brief, it is entitled to no deference when it interprets a person's right to an adjudicative hearing.[1] The record clearly shows that the Department believed it lacked authority to review a finding because of a late request. The Department erroneously understood its own legal authority, and any further action taken on that legal error is plainly erroneous and should be reversed. The Department avoids this central issue by essentially ignoring it throughout its brief.

---

[1] "To the extent that an agency interprets regulations as defining the right to administrative review, its view is not entitled to deference." *Conway v. Dep't of Soc. & Health Servs.*, 131 Wn. App. 406, 416, 120 P.3d 130 (2006).

1. The Department has authority to act

The record shows that the CPS Area Administrator who received Ms. Castillo's request for internal review believed he did not have legal authority to review the finding.[2] The Department acknowledges its own lawyer believed that the Department lacked jurisdiction to review Ms. Castillo's request.[3] The ALJ and the Review Judge apparently were misled by this error because their decisions were in direct response to the Department's Motion to Dismiss *for Lack of Jurisdiction.*

This declination to consider Ms. Castillo's request for review is the central issue in this case, and the Department's briefing fails to directly address it. The Department is entitled to no deference in reaching this conclusion. Because the Department had authority to act, it erroneously interpreted the law and deprived Ms. Castillo of her right to review and a hearing.

The Department alleges a semantic distinction between founded findings and reports of child abuse and neglect, stating that they are two different things. Because a founded finding is not a report, the Department argues, the precatory language of RCW 26.44.010 doesn't matter.[4] Later

---

[2] AR 73.
[3] Dep't resp. at 6. The Department filed a Motion to Dismiss the Hearing for Lack of Jurisdiction. AR 60-61.
[4] Dep't resp. at 21

in its brief, the Department also argues that there is no registry of findings and that "the Department maintains internal records of the founded findings and records pertaining to the investigation."[5] The claim that founded findings are somehow distinct from the Department's duty to maintain accurate records is a distinction without a difference. RCW 26.44.010 directs the Department to "safeguard against arbitrary, malicious or erroneous information or actions." The Department cannot claim that its duty to maintain accurate records allows it to fail to review a founded CPS finding that it has reason to believe is incorrect.

The Department's response admits that it believes it lacked legal authority to review the finding, with no reference to the court's holding in *Nickum v. Bainbridge Island* that suggests that the internal review deadline is not a limitation on agency authority.[6] Nothing in RCW 26.44 expressly limits the Department's ability to act on late requests. And nothing in the Department's response directly refutes this point.

Conway v. DSHS, cited by the Department to support its lack of authority, does not hold otherwise.[7] *Conway* reiterates the maxim that an ALJ may only exercise the authority granted to him or her by rule. In this

---

[5] Dep't resp. at 38-39.
[6] *Nickum v. City of Bainbridge Island*, 153 Wn. App. 366, 377, 223 P.3d 1172, 1177 (2009), *as amended* (Dec. 8, 2009).
[7] *Conway v. Dep't of Soc. & Health Servs. (DSHS)*,131 Wn. App. 406, 120 P.3d 130 (2006).

matter, Department staff themselves misunderstood their ability to act. *Conway*, however, does hold that an agency decision made upon an error of law should be reversed.[8]

The Department's argument puts its statutory duties and policies in conflict. The Department does not address why its ability to control its own records and review them as appropriate is not implied by RCW 26.44 or expressly allowed by the Department's own procedures. The Department's Operations Manual states that DSHS supervisors have authority to modify records at any time at the request of the subject of the record.[9] If the Department lacked authority, the Operations Manual procedure would be illegal. The Department's effort to characterize its failure to review the CPS finding upon Ms. Castillo's request is inconsistent with its own procedures and its general authority and duty as a state agency to ensure that its own records and actions are accurate.

---

[8] *Conway*, 131 Wn. App. at 420.

[9] *See* https://www.dshs.wa.gov/ca/137110-practice-considerations/137115-removal-information ("The supervisor may expunge information from a case record… [when] [t]here is a written request for expungement from the party who is the subject of the erroneous statement.") (last visited December 28, 2016).

B. Ms. Castillo had good cause for a late filing

1. The good cause regulation is applicable and is not inconsistent with WAC 388-15-089

The Department does not address the distinction between a person's right to a statutorily-mandated hearing, and the Department's ability to grant a late hearing request. The Department fails to refute Ms. Castillo's arguments that the Department should have equitably tolled her hearing deadline, or granted her good cause. Finally, the Department's hearing rules at WAC 388-02 and the CPS rules at 388-15 are not inconsistent.

The Department ignores Ms. Castillo's arguments on jurisdiction that this Court agreed with in *Nickum*, namely that a limitation on a litigant's appeal rights is not necessarily a limitation on an agency's ability to review an issue. Even if the person is statutorily barred from seeking a hearing, the agency is not necessarily limited. Without more—such as express statutory language barring the agency from considering the request to review the finding—the Department retains discretion to do so. Within this discretion is the ability to consider whether someone has good cause for a late request for review. Nothing in RCW 26.44 is to the contrary. The Department is free to grant good cause for a late filing; it has expressly authorized ALJs to do this by promulgating WAC 388-02-0020.

WAC 388-02-0020 expressly addresses the situation of a person who is late in making a request because, for example, she ignored a notice because she was in the hospital or because the notice came in a language she did not understand. Under the Department's reasoning, if it sent a notice in English to a person who speaks only Spanish, and that person failed to act in 30 days, she would forever be barred from seeking a hearing or using good cause to argue for a reprieve.

The Department also cites to *Semenenko v. DSHS*[10] for authority that there is no good cause exception. However, *Semenenko* is unpublished and therefore not binding precedent. Further, as an unpublished case, it provided no analysis as to why the good cause rule did not apply to the appellant's request in that case. It merely distinguished *Ryan v. DSHS*,[11] where the Department admitted that good cause does apply to late requests for hearings on findings of adult abuse.

In this case, the ALJ failed to consider Ms. Castillo's good cause request or analyze it under the provisions of CR 60 as the rule requires. This was reversible error. Because there is no conflict between WAC 388-02 and WAC 388-15, if the internal review request is found to be late, the Court should order the Department to consider Ms. Castillo's request for

---

[10] *Semenenko v. Dep't of Soc. & Health Servs. (DSHS),* 182 Wn. App. 1052 (2014).
[11] *Ryan v. Dep't. of Soc. & Health Servs. (DSHS)*, 171 Wn. App. 454, 464, 287 P.3d 629 (2012).

good cause for a late filing, and to accordingly conduct the internal review that is a prerequisite to a hearing on the merits.

2. Equity and fairness support giving Ms. Castillo an opportunity to have her finding reviewed

The Department cites *Griggs v. Averbeck Realty*[12] to claim that justice occurred in this case, and therefore Ms. Castillo does not have good cause for an allegedly late filing. *Griggs* and the cases interpreting good cause under CR 60 support the appellant and the adjudication of cases on their merits. The court in *Griggs* held to the principle that "[j]ustice will not be done if hurried defaults are allowed any more than if continuing delays are permitted."[13] Ms. Castillo's allegedly day-late request is not a "continuing delay", but the Department's failure to review her finding or provide her a hearing based on her belief that she timely asked for review is a "hurried default".

Under *Griggs*, it is unlikely that a Superior Court judge would decline to vacate a default judgment that was obtained one day after the civil litigant's deadline to answer, provided she showed reason for being late and a meritorious defense. Ms. Castillo's documentation filed in support of her request for review and a hearing shows both a reason that

---

[12] *Griggs v. Averbeck Realty, Inc.*, 92 Wn.2d 576, 582, 599 P.2d 1289 (1979).
[13] *Id.* at 582 (*citing to Widucus v. Southwestern Elec. Coop.*, 167 N.E.2d. 799 (1960)).

she was allegedly late requesting internal review and a factual defense to the allegations.[14]

Ms. Castillo's alleged day-late filing is the sole reason she was deprived of her right to a hearing. Giving her the opportunity to present her case in internal review would rectify that deprivation. This would not prejudice the Department in any way and would provide the due process to which Ms. Castillo is entitled. Any further procedural defect in the hearing process is without legal effect given the initial error that occurred when the Department failed to internally review the finding.[15]

By denying Ms. Castillo the right to internal review and an evidentiary hearing, the Department should not now be allowed to argue that she failed to show good cause exists. Ms. Castillo had no opportunity to present evidence to the ALJ that she had an adequate defense to the charges, and the ALJ declined to allow her to demonstrate good cause in any event.

---

[14] AR 70-72.

[15] The Department argues that this court should not reverse and remand because Ms. Castillo's previous counsel filed her DSHS Board of Appeals (BOA) Petition for Review one day late. However, given the Department's argument that the Office of Administrative Hearings lacked jurisdiction to grant her a hearing, it follows that the BOA similarly would have lacked jurisdiction to consider the appeal. Given that the original legal error rendered the entire process void *ab initio*, the late BOA filing does not defeat the initial jurisdictional error that deprived Ms. Castillo of her right to a hearing in the first place.

The Department cannot claim the failure to consider good cause is harmless error when Ms. Castillo never had a full and fair opportunity to demonstrate the nature and strength of her defense. What limited evidence is in the record shows that Ms. Castillo could have successfully contested this neglect allegation at a hearing. Ms. Castillo denied any knowledge of firearms in her home. She disputed the allegations regarding the danger posed by the person in her home. There is not enough evidence in the record to support a finding of neglect against Ms. Castillo.[16]

Equity and fairness, therefore, support giving Ms. Castillo an opportunity to have her finding reviewed.

3. Ms. Castillo's belief that she timely filed an internal review request was reasonable, but under the Department's argument, this is irrelevant

The Department states that Ms. Castillo did not challenge any factual finding that her belief that she timely filed her request for internal review was reasonable.[17] However, the Department also argues that the passage of time rendered both her belief and the notice's literal language about when to request review irrelevant. No matter how reasonable Ms.

---

[16] "Negligent treatment or maltreatment means an act or a failure to act, or the cumulative effects of a pattern of conduct, behavior, or inaction, that evidences a serious disregard of consequences of such magnitude as to constitute a clear and present danger to a child's health, welfare, or safety, including but not limited to conduct prohibited under RCW 9A.42.100." RCW 24.44.020(16).

[17] Dep't resp. at 15.

Castillo was, according to the Department, if she filed one day late, she has no right to challenge the finding made against her. Under this analysis, it doesn't matter if Ms. Castillo—or any other person—was limited by a cognitive disability, if the person who signed for the notice threw it in the trash because he or she was the actual perpetrator, or any other reason that would permit a defaulting party to appear and defend.

The Department's analysis, however, is not contemplated by RCW 26.44, RCW 34.05, or WAC 388-02, as it would deprive appellants of any opportunity to challenge a finding against them should nearly anything result in an untimely appeal or prevent them from being able to timely appeal.

C. The Department never notified Ms. Castillo of her right to an administrative hearing; the request for an ALJ hearing was therefore not late

The Department comments on Ms. Castillo's alleged "late" request for an administrative hearing. However, the Department never notified Ms. Castillo of her right to an ALJ hearing when it denied her request for internal review.[18] Because of this failure to notify Ms. Castillo of her hearing right, the deadline to request ALJ review never started running.[19] Ms. Castillo cannot be penalized for allegedly missing a deadline or

---

[18] AR 73.

[19] *See, e.g., Pal v. Dep't Soc. and Health Serv.*, 185 Wn. App. 775, 784, 342 P.3d 1190 (2015) (noting that due process requires notification in some way of deadline for appeal).

process about which the Department never notified her. Nor did the Department raise this issue below.

D. DSHS's rigid application of its administrative process deprived Ms. Castillo of due process of law

Even if Ms. Castillo lost a statutory right to a hearing under RCW 26.44.125, because the finding deprives her of a liberty interest, she retains a constitutional right to due process that the Department did not provide.

The *Mathews v. Eldridge*[20] factors tip in favor of Ms. Castillo. She has a protected interest in employment that is permanently impaired by the CPS finding made against her. The risk of denying people the opportunity to have a hearing when they have a good reason for a late request imposes unacceptable risk of error into the system. Finally, the government's interest that should be considered is whether there is a substantial interest in maintaining default findings and avoiding hearings for people who file their requests one day late. All of these factors weigh in favor of reviewing the finding and giving Ms. Castillo a hearing on the merits.

1. Ms. Castillo, and all persons impacted by CPS findings, have a protected liberty interest

The Department claims, without authority, that a person must actually lose a job or license to have a protected interest at stake. There is

[20] *Mathews v. Eldridge,* 424 U.S. 319, 96 S.Ct. 893, 47 L. Ed.2d 18 (1976).

no case law supporting this sweeping generalization that the Department uses to deny due process. If correct, then the Department could deny adjudicatory hearings to any person who could not produce evidence that he or she had been denied work or licensure. If upheld, the Department's argument would result in a deprivation of due process for many people with founded findings.

The Court should determine whether a protected liberty interest is at stake. If it is, then the constitutional due process right is not extinguished by the alleged failure to follow the statutory process. The appropriate test is whether the "stigma" imposed by the Department extinguishes a right or status previously recognized under state law.[21] The Department cites no holding that the person alleging infringement of a protected interest must show that she lost a job or license. The loss of a previously available benefit is adequate. Regardless, Ms. Castillo articulated to the Department that she would be deprived of the ability to work with children or even volunteer with her children's schools.[22]

The Ninth Circuit notes that it is "widely recognized" that a complete prohibition on employment implicates a liberty interest that requires due process.[23] In Ms. Castillo's case, her founded finding is

---

[21] *Paul v. Davis*, 424 U.S. 693, 711, 96 S.Ct. 1155, 47 L.Ed.2d 405 (1976).
[22] AR 70-72.
[23] *Dittman v. California*, 191 F.3d 1020, 1029 (9th Cir.1999).

made available to Department staff, and she is associated with child abuse and neglect by any potential employer completing a Department-mandated background check. She is barred from employment in care facilities and in any other field requiring a Department background check.[24] The state's finding results in a total deprivation on Ms. Castillo's ability to obtain employment in fields working with children or vulnerable adults.[25]

Our state courts have also held that a protected liberty interest can be demonstrated by the extinguishment of future possibilities. In *Giles v. DSHS,* the court found that an employee did not have a protected liberty interest affected when the state fired him.[26] But the court noted that a liberty interest could be infringed "if the government imposes a stigma or other disability that forecloses the employee's freedom to take advantage of other employment opportunities."[27] The court did not require that the person had actually applied for those opportunities. The fact that they were foreclosed was adequate.

---

[24] *See, e.g.,* RCW 74.39A.056 and RCW 43.43.830 *et seq*.
[25] *See Dittman*, 191 F.3d at 1029; *Erickson v. United States ex rel. Dep't of Health & Human Servs*., 67 F.3d 858, 863 (9th Cir.1995); see also *Board of Regents State Colleges v. Roth*, 408 U.S. 564, 573 (1972) (finding due process interest in avoiding stigma of government finding).
[26] *Giles v. Dep't of Soc. & Health Servs. (DSHS)*, 90 Wn.2d 457, 583 P.2d 1213 (1978).
[27] *Id.* at 461.

The Department's reliance on *Hardee v. DSHS* to support its argument misstates the conclusion of that case. *Hardee* concerned the loss of a professional license and what standard of proof an agency should be held to when depriving a person of a license.[28] It did not concern the existence or nonexistence of liberty interests, which is the protected interest at issue in this case. It is irrelevant that Ms. Castillo has not lost a job or a license, because it is the stigma of the finding and the professional opportunities that are foreclosed which matter.

Further, not only is Ms. Castillo's interest protected, the deprivation is essentially permanent to her. There is no process by which CPS permits a person to expunge her record or demonstrate her fitness to work in certain fields. The application of the finding causes a permanent barrier to Ms. Castillo's employment opportunities.

Because Ms. Castillo's protected liberty interest is at stake, the Department is required to provide procedural due process of law before depriving her of this interest. An allegedly late request for a statutory internal review process cannot foreclose the right to constitutional due process given the interests at issue in this case.

---

[28] *Hardee v. Dep't of Soc. & Health Servs.*, 152 Wn. App. 48, 55-56, 215 P.3d 214 (2009).

2. Even if Ms. Castillo lost a statutory right to a hearing, she still had a constitutional right to a hearing

The Department focuses on Ms. Castillo's statutory right to a hearing under RCW 26.44.125 and denies she has a constitutional right to a hearing. Even if Ms. Castillo lost her statutory hearing right, which she disputes, she maintained a constitutional right to a meaningful hearing. The Department's argument to the contrary—that there is little risk in its procedures—is contradicted by the multiple times which it has been shown to misapply its own standards during investigations, or to fail to adequately notify people of their rights.[29] The Department's process for granting review of initial findings is unconstitutional as applied to Ms. Castillo because of the high risk of error which the Department believes it cannot correct.

The Department cites to *Valmonte v. Bane* and *State v. Vahl* for support that its procedures for providing a hearing to persons accused of abuse and neglect are constitutional.[30] However, the cases cited by the Department regarding risk of error did not consider a permanent deprivation when examining the risk of an erroneous result. The

[29] *See, e.g., Marcum v. Dep't of Soc. & Health Servs.,* 172 Wn. App. 546, 290 P.3d 1045 (2012); *Brown v. Dep't of Soc. & Health Servs.,* 190 Wn. App. 572, 360 P.3d 875 (2015); *Ryan v. Dep't. of Soc. & Health Servs.*, 171 Wn. App. 454, 464, 287 P.3d 629 (2012); *Pal v. Dep't Soc. & Health Servs.*, 185 Wn. App.775, 784, 342 P.3d 1190 (2015).
[30] Dep't resp. at 41-43.

permanency, as compared with the limited revocation of a license in *State v. Vahl*, is important to consider.

The *Vahl* court cited to authority that the magnitude of the sanction is relevant when considering the adequacy of the process.[31] Citing to *State v. Thomas*, the court noted that if the conviction were a felony conviction, then notification by mail alone may not satisfy the burden of due process.[32]

The Department focuses primarily on the method of notice in this case, suggests it is sufficient for due process, and argues that the appellant essentially advocates for self-determination of when notice is complete. This argument is misplaced and incorrect. Due process includes *both* notice reasonably calculated to inform the affected party of the action and the opportunity to object *and* a meaningful opportunity to be heard in a system that allows for errors to be corrected.[33] And, as in *Thomas*, the magnitude of the sanction—permanent loss of employment opportunity—makes the risk of error in the process before the Court problematic.

Further, the Department fails to acknowledge any potential situation that could impair one's ability to timely request internal review.

---

[31] *State v. Vahl*, 56 Wash. App. 603, 606-07 (1990) (*citing to State v. Thomas*, 25 Wn. App. 770 (1980)).
[32] *State v. Thomas*, 25 Wn. App. 770, 774, 610 P.2d 937 (1980).
[33] *Goldberg v. Kelly*, 397 U.S. 254, 90 S. Ct. 1011, 25 L.Ed.2d 287 (1970).

For example, the Department would find its system adequate if a hospitalized person failed to request review within 30 days of delivery of notice to his or her home. Or, the method of delivery could deliver the notice directly into the hands of the actual perpetrator with no notice to the accused, if that person lived with the accused perpetrator, and the accused might never see the notice. The Department fails to acknowledge the basic unfairness that results when its findings are essentially permanent, even where an appellant had no practical ability to timely request internal review.

As Ms. Castillo has noted, the CPS finding appeal procedures are unconstitutional as applied to her only in the event that the Department lacks authority to grant her a hearing. The question for this Court is not whether the procedures, standing alone, provide due process. The question is whether a system that cannot correct an error when asked to do so one day late is a constitutional one. Given the risk of permanent and significant error, the answer must be "no".

3. The state has an interest in maintaining accurate findings

There is no question the state has an interest in protecting children and vulnerable adults. The question for this case is whether the state has an interest in limiting the process by which people may challenge the findings made against them, or in maintaining default findings in spite of a

person's desire to challenge the underlying facts. The Court should examine whether the state has an interest in not providing hearings to people who seek review one day late, even when they provide argument and evidence that excuses their mistake and demonstrates error in the finding on the merits. This is the interest at stake.

The Department also raises the importance of the protection of vulnerable people by responding to arguments that the appellant did not make. The Department claims in its brief that giving hearings prior to entering the finding in the accused person's record would present too great a risk to vulnerable people.[34] First, Ms. Castillo did not make any argument demanding that hearings must occur prior to the deprivation of her liberty interest, so the argument is a non sequitur. Second, the Department knows that it already denies pre-deprivation due process. It enters the founded finding into the database immediately and the finding is in effect throughout the pendency of any administrative hearing process, prior to any notice to the accused person.[35] Regardless, the Department's argument is inapplicable to the arguments made in this matter.

---

[34] Dept. resp. at 47. "To require a pre-deprivation hearing prior to the findings being entered into a person's record would interfere with the state's interest to quickly respond to allegations of child abuse and take steps to protect the state's most vulnerable citizens."

[35] WAC 388-15-141.

The state's interest in maintaining default findings, without the accused person's version of the events, is minimal at best. Default, unvetted findings, based solely on hearsay and a written report that the accused person has tried to challenge, do little to advance the state's interest. The state also has an interest in not preventing people from working who might otherwise be qualified to do so. Imposing default findings unreasonably restricts the ability of qualified people to participate in employment that they may otherwise be qualified to engage in.

The state's interest in avoiding hearings cannot be relied on either. The state already provides hearings for people with findings. There is no possibility that the evidence in Ms. Castillo's case would have been stale had they considered her request one day late.

For the forgoing reasons, the Court should find that the CPS findings review process, as applied to Ms. Castillo, is unconstitutional.

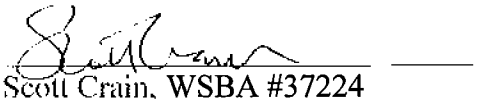
III. CONCLUSION

Ms. Castillo respectfully requests this court to rule as follows: (1) that she complied or substantially complied with the requirements to request review; (2) that her review request was timely, and there was jurisdiction to hear the appeal; (3) in the alternative, that the notice and process violates due process of law; (4) in the alternative, that she had good cause for requesting a hearing late; (5) that the statutory internal

review process does not extinguish her right to constitutional due process; and (6) that she is entitled to attorney fees and costs. The court should reverse the administrative decision to dismiss Ms. Castillo's request for a hearing and provide her the opportunity to have a full determination on the merits of the Department's CPS finding.

Respectfully submitted this 28th day of December, 2016.

NORTHWEST JUSTICE PROJECT



Scott Crain, WSBA #37224
Luanne Serafin, WSBA #47834
Attorneys for Appellant

CERTIFICATE OF SERVICE

Scott Crain declares as follows:

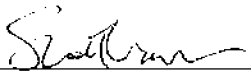
I am a citizen of the United States of America and over the age of 18 years and I am competent to testify to the matters set forth herein.

I certify that on December 28th 2016, I served a true and correct copy of this REPLY BRIEF and this CERTIFICATE OF SERVICE for delivery to the persons indicated below by first class mail and email as follows:

Lauren Roddy
Assistant Attorney General
Washington Attorney General's Office
Social and Health Services Division
SHO Division, OID No. 91021
PO Box 40124
7141 Cleanwater Drive SW
Olympia, WA 98504-0124
Email: LaurenRl@atg.wa.gov

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 28th day of December, 2016 at Seattle, Washington



Scott Crain

NORTHWEST JUSTICE PROJECT

December 28, 2016 - 9:58 AM

Transmittal Letter

Document Uploaded: 4-490633-Reply Brief.pdf

Case Name: Dayanara Castillo v. Department of Social and Health Sevices, State of Washington

Court of Appeals Case Number: 49063-3

Is this a Personal Restraint Petition? Yes ■ No

The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: ____

Answer/Reply to Motion: ____

■ Brief: Reply

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: ____
Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

No Comments were entered.

Sender Name: Luanne M Serafin - Email: luannem@nwjustice.org